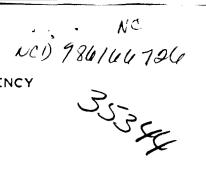
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E. ATLANTA, GEORGIA 30365



*** ENFORCEMENT CONFIDENTIAL *** *** FOIA EXEMPT *** *** DO NOT RELEASE ***

MEMORANDUM

DATE: JUN 0 1 1993

SUBJECT: Decision Not Pursue Cost Recovery Action

Currituck Phosphorus Debris Site

Currituck, North Carolina

FROM: Carmen J. Santiago-Ocasio, Enforcement Project Manager

Cost Recovery Section - North Unit

Waste Programs Branch Waste Management Division

TO: Joseph R. Franzmathes, Director

Waste Management Division

Site Description - Superfund Site ID Number: NCD986166726 A.

Currituck Phosphorus Debris ("the site") is located on Point Harbor, Currituck County, North Carolina. Point Harbor is located on the North Carolina Coast west side of the Wright Memorial Bridge and lies on the eastern coastal plain.

In January 1989, a private citizen reported an undetonated phosphorus marker shell that was washed onto the Point Harbor bulk head during an ocean storm surge. Such shells emit white smoke when detonated, and are routinely used by the U.S. Navy and Coast Guard during training exercises. Unless lost, undetonated shells were retrieved following these exercises.

Work Authorized and Conducted and Associated Costs: В.

Bill Klutz, EPA OSC, presented to the site, on January 20, 1989, after a phone call he received regarding a live Navy phosphorus shell which washed up on the beach in Currituck County. Klutz contacted the Coast Guard, the shell was sand-packed in a drum, and within a short period of its discovery, the drum was removed by U.S. Navy personnel from Norfolk, VA. At the same time, Navy personnel removed a 5 gallon can of naval jelly which had washed to shore.

The total cost amount associate with the site is \$534.85.

C. <u>Discussion of Basis Not To Pursue Cost Recovery:</u>

No releases of hazardous substances or injuries occurred as a result of the incident. The OSC, at that time, Mr. Bill Klutz, recommended no further action at this site.

Since the total cost amount spent at the site was \$534.85 it is not economically feasible to pursue a cost recovery action on this site.

The Decision Not to Pursue Cost Recovery Action was not reviewed by the Office of Regional Counsel (ORC), pursuant to current guidance documents and an agreement between Cost Recovery and ORC. According to the agreement, in cases where government expenditures are less the \$5,000.00 and where there are no outstanding legal issues, review by ORC is not required.

D. <u>Conclusion</u>:

This site is a result of an undetonated shell left after training exercises were done by the U.S. Navy or the Coast Guard. The shell was found intact and no releases of hazardous substances or injuries occurred as a result of the incident. Given that just \$534.85 were spent at the site is the Region's decision not to pursue cost recovery action since:

a) presently we have limited resources and, b) the costs of pursuing any cost recovery would exceed the present expenditure and the tax payers would bear the burden of all costs since the likely responsible party is a federal agency. The statute of limitation for a cost recovery action after the removal expired in 1992. (Attached SCORES Report)

Decision Not to Pursue Cost Recovery Action Currituck Phosphorus Debris EPA ID#: NCD986166726 Concurrence Page

Reviewer:

Carmen of Santiago-Ocasio, EPM
North Cost Recovery Section
Waste Programs Branch

Concur

Ron D. Wilson, Chief North Cost Recovery Section Waste Programs Branch

> Constance Jones, Chief Cost Recovery Section Waste Programs Branch

Kla

Kirk Luckus, Chief Waste Programs Branch

Richard D. Green, Associate Director Waste Management Division

Joseph R. Franzmathes, Director Waste Management Division 1

HAZARDOUS SUBSTANCE RESPONSE CURRITUCK PHOSPHORUS NC #4TFP MONITORING REPORT BY ALLOWANCE HOLDER, SITE NUMBER AND ACTIVITY CODE FMD OBJECT CLASSES (EXCLUDING OBJ CLASSES '11' ,'12' & '13') SALARIES & FRINGE THRU MAY 13,1993 PREPARED BY ACCOUNTING OPERATIONS AND REPORTING TEAM

SFO		22	DURHA	1								
AH RC	SITE	C	DOC CONTRL NUMBER	ACCOUNT NUMBER	OBLIG DOCUMENT NUMBER		OBJT CLAS	SOC.SEC.NO. (TRAVEL)	TRAVELER NAME	CUMULATIVE OBLIGATIONS CURRENT+PRIOR	CUM PAYMENTS (EXCLUDING ADVANCES)	UNPAID OBLIGATIONS
4AD	FP	£	рн0046	9TFA4ADEFP	0074044082	25	2535	то	TAL SFATY	1,000.00 1,000.00	370.64 370.64	629.36 629.36
								TOTAL	SFSITENO	1,000.00	370.64	629.36
								T	OTAL AHRC	1,000.00	370.64	629.36
									TOTAL SFO	1,000.00	370.64	629.36

05-13-93

ENVIRONMENTAL PROTECTION AGENCY

PAGE

2

HAZARDOUS SUBSTANCE RESPONSE CURRITUCK PHOSPHORUS NC #4TFP
MONITORING REPORT BY ALLOWANCE HOLDER, SITE NUMBER AND ACTIVITY CODE
FMD OBJECT CLASSES (EXCLUDING OBJ CLASSES '11' ,'12' & '13')
SALARIES & FRINGE THRU MAY 13,1993
PREPARED BY ACCOUNTING OPERATIONS AND REPORTING TEAM

AH SITE A DOC RC C CONTR T NUMBE Y	L NUMBER	OBLIG DOCUMENT NUMBER	MAJ OBJ OC CLAS		TRAVELER NAME	CUMULATIVE OBLIGATIONS CURRENT+PRIOR	BLIGATIONS (EXCLUDING RRENT+PRIOR ADVANCES)	
				 Gi	RAND TOTAL	1,000.00	370.64	629.36

READY
EXEC 'FMSY.CLIST(CLSP0978)'
IKJ56274A ENTER INPUT JOB STREAM:
IKJ56250I JOB OFASPUR(JOB17304) SUBMITTED
READY
END

FY 81 THRU 93 PAYROLL REPORT FOR HAZ SUB RESP REGION 4
PAY PERIOD REPORT FOR CURRITUCK PHOSPHRUS NC #4TFP
THRU PP 16 MAY 1, 1993
PREPARED BY ACCOUNTING OPERATIONS AND REPORTING UNIT

SFSITENO FP AHRC 04D

AIINC	040					
NAME	SOC SEC #	SOF	P ACCT A P 2T4 C T Y	PAYR HOURS	PAYR AMOUNT	TRANS DATE
MILLER,	407565005	2	11 TGB 5 TOTAL SOF	2.0 2.0	50.21 50.21	030392
			TOTAL SSN	2.0	50.21	
			TOTAL AHRC	2.0	50.21	

05-13-93

ENVIRONMENTAL PROTECTION AGENCY

PAGE

2

FY 81 THRU 93 PAYROLL REPORT FOR HAZ SUB RESP REGION 4 PAY PERIOD REPORT FOR CURRITUCK PHOSPHRUS

THRU PP 16 MAY 1, 1993

PREPARED BY ACCOUNTING OPERATIONS AND REPORTING UNIT

SFSITENO FP AHRC 04D

NAME SOC SEC # SOF P ACCT A PAYR PAYR TRANS 2T4 C HOURS AMOUNT DATE

> 2.0 TOTAL SFSITENO

50.21

05-13-93

ENVIRONMENTAL PROTECTION AGENCY

PAGE

3

FY 81 THRU 93 PAYROLL REPORT FOR HAZ SUB RESP REGION 4
PAY PERIOD REPORT FOR CURRITUCK PHOSPHRUS NC #4TFP
THRU PP 16 MAY 1, 1993
PREPARED BY ACCOUNTING OPERATIONS AND REPORTING UNIT

NAME	soc	SEC	#	SOF	P P	ACCT 2T4		PAYR AMOUNT	TRANS DATE

GRAND TOTAL

2.0

50.21

READY EXEC 'FMSY.CLIST(CLSPSFPY)' IKJ56274A ENTER INPUT JOB STREAM: IKJ56250I JOB OFASPUR(JOB17698) SUBMITTED READY END

PAGE 1 REPORT DATE: 05/13/93

FINAL IFMS RECONCILIATION PENDING

ITEMIZED COST SUMMARY REPORT CURRITUCK PHOSPHORUS, NC SITE ID = 4-FP

COSTS FROM 10/01/69 THROUGH 04/30/93

REGIONAL PAYROLL COSTS	\$ 50.21
HEADQUARTERS PAYROLL COSTS	0.00
EPA INDIRECT COSTS	114.00
REGIONAL TRAVEL COSTS	0.00
HEADQUARTERS TRAVEL COSTS	0.00
EMERGENCY REMOVAL CLEANUP (ERC) CONTRACT	
O. H. MATERIALS (68-01-7404)	370.64
TOTAL SITE COSTS:	\$ 534.85

REPORT DATE: 05/13/93

FINAL IFMS RECONCILIATION PENDING

REGIONAL PAYROLL COSTS
CURRITUCK PHOSPHORUS, NC SITE ID = 4-FP

FROM PAY PERIOD 01 OF FISCAL YEAR 1970 THROUGH PAY PERIOD 15 OF FISCAL YEAR 1993

Employee Name	Fiscal Year	Pay Period	Office	Payroll Hours	Payroll Amount
MILLER, HERBERT E., JR.	92	11	04D	2.00	50.21
REGIONAL PAYROLL COSTS				2.00	\$50.21

- 4

PAGE 1 REPORT DATE: 05/13/93

FINAL IFMS RECONCILIATION PENDING

HEADQUARTERS PAYROLL COSTS CURRITUCK PHOSPHORUS, NC SITE ID = 4-FP

FROM PAY PERIOD 01 OF FISCAL YEAR 1970 THROUGH PAY PERIOD 15 OF FISCAL YEAR 1993

Employee Name	Fiscal Year	Pay Period	Office	Payroll Hours	Payroll Amount
			_		
HEADQUARTERS PAYROLL COSTS				0.00	0.00
			=	=======	=========

REPORT DATE: 05/13/93

FINAL IFMS RECONCILIATION PENDING

REGIONAL TRAVEL COSTS
CURRITUCK PHOSPHORUS, NC SITE ID = 4-FP

FROM 10/01/69 THROUGH 04/30/93

Name	Travel Voucher Number	Treasury Schedule	Treasury Schedule Date	
REGIONAL TRAVEL COSTS			\$	0.00

Name

REPORT DATE: 05/13/93

FINAL IFMS RECONCILIATION PENDING

HEADQUARTERS TRAVEL COSTS CURRITUCK PHOSPHORUS, NC SITE ID = 4-FP

FROM 10/01/69 THROUGH 04/30/93

Travel Treasury Treasury
Voucher Schedule Schedule Travel
Number Date Cost

HEADQUARTERS TRAVEL COSTS

0.00

ţ

REPORT DATE: 05/13/93

FINAL IFMS RECONCILIATION PENDING

CURRITUCK PHOSPHORUS, NC SITE ID = 4-FP

FROM 10/01/69 THROUGH 04/30/93

EMERGENCY REMOVAL CLEANUP (ERC) CONTRACT

CONTRACTOR : O. H. MATERIALS

CONTRACT NUMBER : 68-01-7404

DELIVERY ORDER INFO : Delivery No. Start Date End Date

4082 / / / /

PROJECT OFFICER :

DATES OF SERVICE : FROM / / TO / /

SUMMARY OF SERVICE :

TOTAL COSTS : \$ 370.64

DOCUMENTATION: Copies of Applicable Paid Vouchers and Treasury Schedules

VOUCHER NUMBER	VOUCHER DATE	VOUCHER AMOUNT		RY SCHEDULE R AND DATE	SITE AMOUNT
					
	1 1	0.00	08904	07/10/89	370.64

NORTH CAROLINA

DEHNR/DSWM

SUN : SREED SO

File 1.8 NFRAP 6/13/90 K. Cam

Kelly Cain

Currituck Phosphorous NCD 986166726

Preliminary Assessment May 1990

By: Mark Durway
Hydrogeologist
Superfund Section
Division of Solid Waste Management



May 13 Alto 90

State of North Carolina Department of Environment, Health, and Natural Resources Division of Solid Waste Management P.O. Box 27687 Raleigh, North Carolina 27611-7687

James G. Martin, Governor William W. Cobey, Jr., Secretary William L. Meyer Director

May 21, 1990

Mr. Robert Morris EPA N.C. CERCLA Project Officer U.S. EPA Region IV 345 Courtland Street, NE Atlanta, GA 30365

Subject: Preliminary Assessment Report

Site:

Currituck Phosphorous

NCD 986166726

Point Harbor, Currituck Co., NC 27929

Dear Mr Morris:

Provided herewith is the Preliminary Assessment package for the subject site. This assessment is based on information from persons who responded to the emergency at this site.

In February 1990, an undetonated phosphorous marker shell was washed onto the Point Harbor bulk head during an ocean storm surge. (Point Harbor is located on the North Carolina Coast west of Kitty Hawk on the west side of the Wright Memorial Bridge). Such shells emit white smoke when detonated, and are routinely used by the U.S. Navy and Coast Guard during training exercises. Unless lost, undetonated shells are retrieved following these exercises.

According to Donnie Beacham of the Currituck County Emergency Services office, a private citizen reported the shell, and it was safely removed shortly after its discovery by Kenny Mercer of the Coinjock Coast Guard Station in Currituck, NC. Bill Klutz of U.S. EPA Region IV, who was also present during the incident, confirmed that the shell was properly handled upon being recovered, although he indicated that Navy personnel from Norfolk, Va. removed the shell. Klutz indicated that the Navy personnel also removed a five-gallon can of naval jelly which had been found. Neither Beacham nor Klutz had written reports on the incident.

Mr. Robert Morris May 21, 1990 Page 2

No releases of hazardous substances or injuries occurred as a result of the incident according to Beacham and Klutz. For this reason, <u>No Further Action</u> is recommended at this site.

Please contact me at 919/733-2801, if additional information is required.

Sincerely,

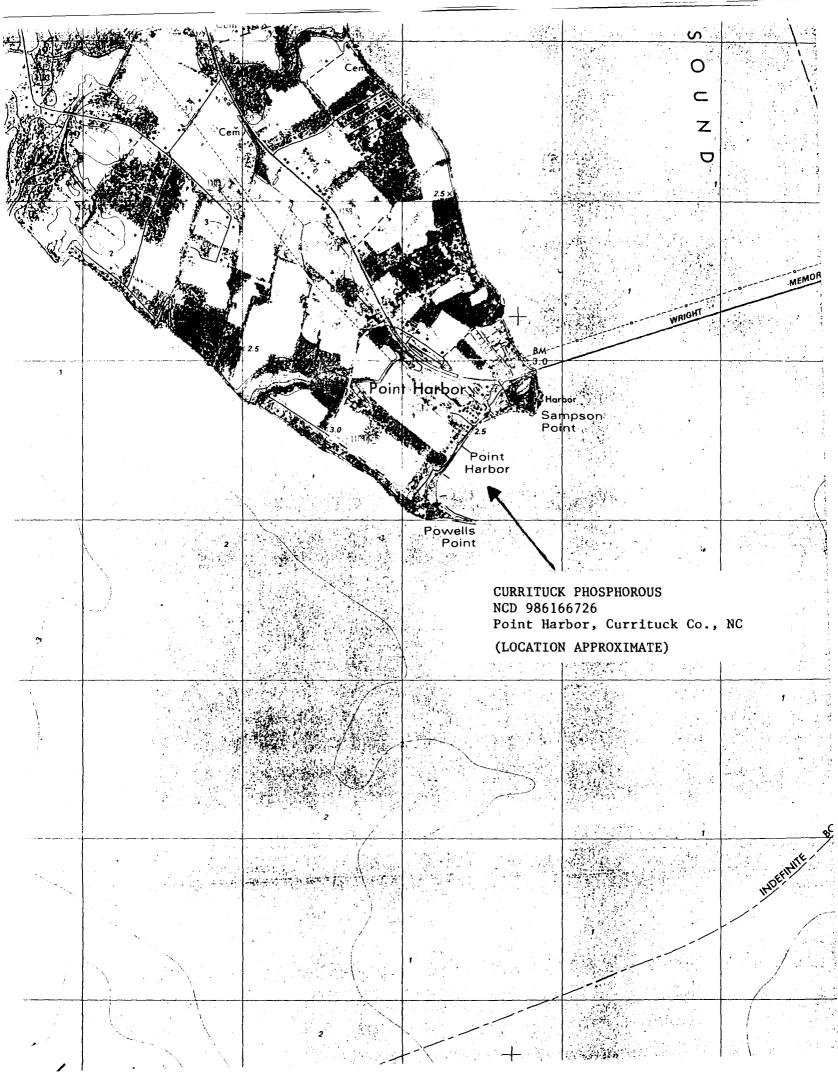
D. Mach Durway

D. Mark Durway, Hydrogeologist Superfund Section

DMD/currituc.pa

References

- Durway, D.M., file memo regarding information from Bill Klutz of U.S. EPA Region IV, 4-23-90.
- Durway, D.M., file memo regarding information from Donnie Beacham of Currituck County Emergency Services, 4-24-90.



		DA
00	三	-~~

POTENTIAL HAZARDOUS WASTE SITE

	I. IDENT!FICATION					
OI STATE	986166726					

PART	PRELIM!NARY 1 - SITE INFORMA			MENT	NCD	98616672	6
II. SITE NAME AND LOCATION			·		- /	·	
O1 SITE NAME (Legel, common, or descriptive name of site)		02 STREE	T, ROUTE NO., C	R SPEC	IFIC LOCATION IDENTIFIER		
CURRITUCK PHOSPHOROUS	•						
POINT HARBOR		NC NC	05 ZIP CODE 27929	os co Cl	UNTY JRRITUCK	07 COUNTY CODE 27	08 CONG DIST
	NGTUDE 47'30"			<u></u>			
10 DIRECTIONS TO SITE (Starting from nearest public road)	· · · · · · · · · · · · · · · · · · ·	•					
From Kitty Hawk, travel west	to Point Harl	oor on	the Wri	ght l	Memorial Bridge.		
III. RESPONSIBLE PARTIES							
01 OWNER (# known)	•	02 STREE	T (Business, malling	, residenti	ω;		1
U.S. Navy or U.S. Coast Guar	d (assumed)	1					
03 CITY		04 STATE	05 ZIP CODE	C	6 TELEPHONE NUMBER		
				- (+	()		
07 OPERATOR (If known and different from owner)		08 STREE	T (Business, melling	, residenti	ω)		
O9 CITY		10 STATE	11 ZIP CODE	13	2 TELEPHONE NUMBER	- 	
)		}
13 TYPE OF OY/NERSHIP (Check one)	•		L	<u>l</u> .			
🗱 A. PRIVATE D B. FEDERAL:			_ D C. STA	TE	DD.COUNTY DE. MUN	RICIPAL	
	(Agency name)						
☐ F. OTHER:	ciyj		🗆 G. UNI	KNOWN	(:		·
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all Ina) apply						•	
A. RCRA 3001 DATE RECEIVED: 1 MONTH DAY YEAR	B. UNCONTROLL	ED WAST	E SITE ICERCIA	103 c) [DATE RECEIVED: MONTH DA	Y YEAR DE C	C. NONE
IV. CHARACTERIZATION OF POTENTIAL HAZARD				·····			
O1 ON SITE INSPECTION BY I	Check at that apply)				· , , ·		
	A. EPA D B. EPA E. LOCAL HEALTH OFF	CONTRA			TATE D.OTHER (Ltuck Emergency	CONTRACTOR	₹ <i>:</i> -
	TRACTOR NAME(S):						- 1
02 SITE STATUS (Check one)	03 YEARS OF OPER	ATION	1		and Fahamana 1	000	
Ø A ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN		EGINNING Y		NG YEAR	red February 1	990	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOW		COMMITTED I	2.00				
Undetonated phosphorous mar	ker shell wash	ned as	hore fol	lowin	ng a Navy or	Coast	
Guard training exercise.					•		
	• '						İ
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT A	ND/OR POPULATION		•			•	
Shell was safely removed an	d disposed of	by Ke	nny Merc	er of	f the Coinjock C	oast Gua	ird
Station in Currituck Co. N	o releases of	hazar	dous sub	stand	ces or injuries	resulted	1.
Bill Klutz of U.S. EPA was	present during	g shel	1 remova	1.			
V. PRIORITY ASSESSMENT	,						
O 1 PRIORITY FOR INSPECTION (Check one. # high or medium is checks	d, complete Pert 2 - Waste Info	melion and P	en 3 - Description of	Hazardov	Conditions and Incidents)		
A. HIGH B. MEDIUM [Inspection required promptly] (Inspection required	C. LOW	avalable bas	(M. D. NC		Uon needed, complete current dispos	tion torm!	
VI. INFORMATION AVAILABLE FROM							
01 CONTACT	02 OF IApancy/Organia					03 TELEPHON	
Donnie Beacham	Currituck	Co. E	mergency	Serv	vices Dept.	(919) 232	!-2115
04 PERSON RESPONSIBLE FOR ASSESSMENT D. Mark Durway	N.C. DEHNI	1 .	perfund		07 TELEPHONE NUMBER (919) 733-2801	08 DATE 5,2	1,90

SEPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 2 - WASTE INFORMATION

I. IDENTIFICATION
OF STATE OF SITE NUMBER
NCD 986166726

II. WASTES	TATES, QUANTITIES, AN	O CHARACTERIS	TICS							
O1 PHYSICAL S	TATES (Check of Initiaply)	02 WASTE QUANTITY		03 WASTE CHARACTE	RISTICS ICARCA MINE	+oply)				
X SOUR LE STURRE CONSTRUCTIONS CO STUDGE LO G. GAS		moti brint		CLA TOXIC OF ESOURCE OF IMBROY VOLATILE DIB, COMPOSIVE OF FIGHER THOUS OF EXPLOSIVE DIC, RADIOACTIVE OF FIGHT BLE DID, PERSISTENT OF HIGHITABLE DIM NOT APPLICABLE						
LIC OFFIER	(Specify)	NO OF ORUMS	and the second of the second o			<u> </u>	-			
III. WASTET	YPE	*								
CATEGORY	SUBSTANCE N	AME	DI GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS					
SLU .	SLUDGE									
onw	OILY WASTE				One (1) 1	ındetonated ph	osphorous			
SOL	SOLVENTS				marker sh	iell	ospherous			
PSD	PESTICIDES									
200	OTHER ORGANIC CH	HEMICALS								
30	INORGANIC CHEMIC	ALS								
.:CD	ACIOS									
£4S	BASES					· · · · · · · · · · · · · · · · · · ·				
MES	HEAVY METALS									
IV. BAZARDO	OUS SUBSTANCES (See A)	standle for most he quently i	Hed CAS Numbers)							
21.0475608Y	OZ SUBSTANCE N	AME	03 CAS NUMBER	04 STORAGE/DISE	POSAL METHOD	05 CONCENTRATION	CONCENTRATION			
IOC	Phosphorous		7723140	removed sa	foly by					
				U.S. Coast						
	and a second specific of the second s						·			
							<u> </u>			
						•				
							 			
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							ļ			
V. FEEDSTO	CKS ISER Appleading to CAS Humb	•15)								
T+TEGODY	elfEEDSTOC	КИАМЕ	02 CAS HUMBER	CATEGORY	O: FEEDS	HOYOK NAME	02 CAS NUMBER			
FDS	N/A			FDS	.,,					
FDS				FDS						
F05				FDS		Control to the second				
				FOS						
VI IDURGES	OF INFORMATION 1044	Landing references and the	tie lies pample and the			The second secon	L			
 Bill Donn 	Klutz, U.S. EPA ie Beacham, Curi	A Region IV, rituck Co. E	personal c Emergency Se	communication ervices, pers	n, 4-23-90. sonal commu	nication, 4-2	4-90.			

April 23, 1990

To: File

From: D. Mark Durway

Re: Information from Bill Klutz regarding the Currituck phosphorous shell incident of February 1990.

Bill Klutz of EPA Region IV (404/347-3931) was conducting remedial work at FCX in Greenville when he received a phone call regarding a live Navy phosphorous shell which washed up on the beach in Currituck County. Klutz contacted the Coast Guard, the shell was sand-packed in a drum, and within a short period of its discovery, the drum was removed by U.S. Navy personnel from Norfolk, VA. At the same time, Navy personnel removed a 5 gallon can of naval jelly which had washed to shore. (Naval jelly is a corrosive).

Klutz indicated that no contamination of soil or water occurred as a result of this incident, and that a formal response report was not written.

The site where the shell was discovered is referred to by the U.S. EPA as Currituck Phosphorous (NCD 986166726). The EPA spill number for the site, assigned 2/21/90, is 04FP.

DMD/currituc.1

April 24, 1990

To: Currituck Phosphorous file (NCD 986166726)

From: D. Mark Durway

Re: Information from Donnie Beacham regarding phosphorous

marker flare that washed up at Point Harbor,

Currituck Co.

Donnie Beacham of the Currituck County Emergency Services Office (919/232-2115) told me that an undetonated phosphorous marker shell was flipped up onto a bulk head at Point Harbor in February 1990. (Point Harbor is located west of Kitty Hawk at the west end of the Wright Memorial Bridge). Beacham contacted Kenny Mercer of the Coinjock Coast Guard Station, who took and disposed of the shell.

According to Beacham, marker shells are dropped from planes during Navy and Coast Guard training exercises, and are supposed to detonate upon impact with the ocean. Unless lost, undetonated shells are retrieved following training exercises.

Donnie Beacham's address is as follows:

Currituck County Emergency Services Office P.O. Box 240 Currituck, NC 27929

DMD/currituc.2



State of North Carolina Department of Environment, Health, and Natural Resources Division of Solid Waste Management P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor William W. Cobey, Jr., Secretary William L. Meyer Director

May 21, 1990

Mr. Robert Morris EPA N.C. CERCLA Project Officer U.S. EPA Region IV 345 Courtland Street, NE Atlanta, GA 30365

Subject: Preliminary HRS Score for Preliminary Assessment

Site:

Currituck Phosphorous

NCD 986166726

Point Harbor, Currituck Co., NC 27929

Dear Mr Morris:

Please find attached the preliminary HRS score, score sheets, and a reference list for the subject site.

Please contact me at 919/733-2801, if additional information is required.

Sincerely,

D. Male Durwa

D. Mark Durway, Hydrogeologist Superfund Section

Attachments

DMD/currituc.hrs

PRELIMINARY HRS SCORE FOR PRELIMINARY ASSESSMENT

Facility name:CURRITUCK PHOSPHOROUS (NCD 986166726)									
Location: Point Harbor bulk head, Currituck Co., NC									
EPA Region: IV									
Person(s) in charge of the facility: Donnie Beacham									
Currituck Co. Emergency Services									
tel. (919) 232-2115									
Name of Reviewer: D. Mark Durway Date: 4/24/90 General description of the facility:									
(For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)									
In February 1990, an undetonated phosphorous marker									
flare was flipped up by the sea onto a bulk head. The									
flare was safely removed and disposed of by the U.S.									
Coast Guard. No releases of hazardous substances or									
injuries occurred as a result of this incident.									
Scores: $S_M = 0$ ($S_{qw} = 0$ $S_{sw} = 0$ $S_a = 0$)									
$S_{FF} = 0$									
$S_{DC} = 0$									

FIGURE 1 HRS COVER SHEET

			Ground Water	r Route Work S	heet			
	Rating Factor		Assigned (Circle		Score	Max. Score	Ref. (Section)	
1	Observed Release	,	0	1	0	45	3.1	
	If observed releas							
2	Route Characteris Depth to Aquifer		0 1 2	3	2		6	3.2
	Concern Net Precipitation Permeability of t	he	0 1 2 0 1 2	3 3	1		3 3	
	Unsaturated Zo Physical State	ne	0 1 2	3	1		3	
		-	Total Route Char	acteristics Scor	re		15	
3]	Containment	No rele	ase 0 1 2	3	1	0	3	3.3
4	Waste Characteris Toxicity/Persiste Hazardous Wast Quantity	ence		9 12 15 18 3 4 5 6 7	1 8 1		18 8	3.4
				•				•
		1	Fotal Waste Char	racteristics Sco	re		26	
5	Targets Ground Water U Distance to Nea Well/Population Served	rest	0 1 2 0 4 6 12 16 18 24 30 32	8 10 3 20	3		9 40	3.5
			Total Targ	ets Score			49	
6			1 × 4 × 5] × 3 × 4			0	57,330	
7	Divide line 6 b	y 57,330 a	nd multiply by 10	00	Sgw =	0	•	

FIGURE 2
GROUND WATER ROUTE WORK SHEET

Rating Factor		ned Value cle One)	Multi- plier	Score	Max. Score	Ref. (Section)
1 Observed Release	0	45	1	0	45	4.1
If observed release is give if observed release is give			•			
2 Route Characteristics						4.2
Facility Slope and Interv Terrain	rening 0 1	2 3	1		3	
1-yr. 24-hr. Rainfall	0 1	2 3	1		3	
Distance to Nearest Sur Water	face 0 1	2 3	2		6	
Physical State	0 1	2 3 .	1		3	
	Total Route C	Characteristics Score			15	
3 Containment No rele	ase 0 1	2 3	1	0	3	4.3
4 Waste Characteristics			,		· · · · · · · · · · · · · · · · · · ·	4.4
Toxicity/Persistence	0 3	6 9 12 15 18	1		18	
Hazardous Waste Quantity	0 1	2 3 4 5 6 7	8 1		8	i,
		•				
	Total Waste C	Characteristics Score			26	
5 Targets						4.5
Surface Water Use	0 1		3		9	
Distance to a Sensitive Environment	0 1	2 3	2		6	
Population Served/Dista to Water Intake Downstream	nce 0 4 12 16 24 30		1		40	
<u></u>					 1	
	Total T	argets Score			55	
	1 × 4 × 2 × 3 ×	_ ===		0	64,350	
				 +		

FIGURE 7
SURFACE WATER ROUTE WORK SHEET

REFS

			A	ir Rot	ute V	Vork Sh	eet				
	Rating Factor		Assigned Value Mu (Circle One) pli						Score	Max. Score	Ref. (Section)
1	Observed Release		0			45		1	0	45	5.1
	Date and Location:	····									- · · · · · · · · · · · · · · · · · · ·
	Sampling Protocol:										
		e S _a = 0. hen proce									
2	Waste Characteristi Reactivity and Incompatibility	ics	0	1 2	3			1		3	5.2
	Toxicity Hazardous Waste Quantity			1 2		4 5	6 7 8	3 1		9 8	
		Т.	otal Was	te Ch	aract	eristics	Score			20	
3	Targets Population Within 4-Mile Radius		} 0 21	9 12 24 27		18		1		30	5.3
	Distance to Sensit Environment Land Use	tive		1 2				2		6 3	
	20110 000		·		Ū			·		J	
				··							
			Tot	al Tar	gets	Score				39	
4	Multiply 1 x 2	× 3							0	35,100	
5	Divide line 4 by	35,100 an	d multip	ly by	100			Sa=	0		

FIGURE 9
AIR ROUTE WORK SHEET

	s	s²
Groundwater Route Score (S _{gw})	0	0
Surface Water Route Score (S _{SW})	0	0
Air Route Score (Sa)	0	0
$s_{gw}^2 + s_{sw}^2 + s_a^2$		0
$\sqrt{s_{gw}^2 + s_{sw}^2 + s_a^2}$		0 .
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2} / 1.73 = S_M =$		0

FIGURE 10 WORKSHEET FOR COMPUTING S_{M}

	Fire a	 und	Ext	olos	 sior	ı W	ori	k Sh	neet						
Rating Factor			gne				_	_		Multi- plier	Score	Max. Score	Ref. (Section)		
1 Containment	1					3				1		3	7.1	waste	removed
Waste Characteristics Direct Evidence Ignitability Reactivity Incompatibility Hazardous Waste Quantity	0		2	3 3	4	5	6	3 7	7 8	1 1 1 1		3 3 3 3 8	7.2		
	Total Was	—-	—— Cha			istic		Sco	· ore			20			
3 Targets				_								<u> </u>	7.3		
Distance to Nearest Population	0	1	2	3	4	5				1		5		 	
Distance to Nearest Building	0	1	2	3						1		3			
Distance to Sensitive Environment	0	1	2	3						1		3			
Land Use Population Within	0	1	-		4	5				1 1		3 5	•		
2-Mile Radius Buildings Within 2-Mile Radius	0	1	2	3	4	5		•		1		5			
	To	tal	Tar	gets	s S	core	 e					24			
4 Multiply 1 x 2 x 3			-								0	1,440	-		
5 Divide line 4 by 1,440 a	ind multiply	y b	y 10	00						SFE -	0	 			

FIGURE 11
FIRE AND EXPLOSION WORK SHEET

Direct Contact Work Sheet											
	Rating Factor		ed \ le O		Multi- plier	Score	Max. Score	Ref. (Section)			
1	Observed Incident	.0			4	5		1	0	45	8.1
-		ceed to line 4 eed to line 2									
2	Accessibility	0	1 2	2 3				1		3	8.2
3	Containment	0	18	5				1	0	15	8.3
4	Waste Characteristics Toxicity		1 2	: 3				5		15	8.4
5	Targets Population Within a 1-Mile Radius	0	1 2	2 3	4	5		4		20	8.5
	Distance to a Critical Habitat	0	1 2	3				4		12	
	_	-									
			tal Ta		3 S	ore			•	32	
6		tipiy 1 x 4 ply 2 x 3		_	5]	•		0	21,600	
7	Divide line 6 by 21,600 and multiply by 100 SDC = 0										

FIGURE 12 DIRECT CONTACT WORK SHEET

References

- 1) Durway, D.M., file memo regarding information from Bill Klutz of U.S. EPA Region IV, 4-23-90.
- Durway, D.M., file memo regarding information from Donnie Beacham of Currituck County Emergency Services, 4-24-90.



REMIT TO: P.O. BOX 74070-S

CLEVELAND, OHIO 44194

Duplicate

NVOICE

O.H. MATERIALS CORP. 16406 U.S. Route 224 East P.O. Box 551

Findlay, Ohio 45839-0551

Phone: 419-423-3526 800-537-9540 (24 hr)

800-537-5660 (in Ohio) Telex: 298248 OHMI UR (RCA)

DIRECT INQUIRIES TO:

PAGE NO: 1 INVOICE NO: 6873-001

TERMS: NET 30

May 15 1989

USEPA Region IV Deputy Project Officer, 345 Courtland St. N.E. Atlanta, GA 30365

ATTENTION: Fred Stroud, DPO

CONTRACT NO: 68-01-7404 DELIVERY ORDER NO: 7404-04-082

RE: O.H. MATERIALS CORP. Project No.6873 CURRITUCK NC

Attached is a partial invoice for services rendered in accordance with contract No: 68-01-7404 and delivery order NO: 7404-04-082 located at the CURRITUCK PHOSPHORUS SITE site in CURRITUCK NC

If there are any questions regarding the following substantiation please call Jim Leonard at 1-800-537-9540 Extension 4278.

Invoice Recap

		Current		Cumulative
		770 47		370.64
Personnel Total		370.64		
Equipment Total		0.00		0.00
Field Purchases Total		0.00		0.00
Subcontractors Breakdown				
Per Diems	0.00		0.00	
Sampling and Analysis	0.00		0.00	
Transportation Services	0.00		0.00	
Disposal Services	0.00		0.00	
Material Purchases	0.00		0.00	
Subcontracted Services	0.00		0.00	
Subcontractors Total		0.00		0.00
Invoice Total		370.64		370.64
*******		=======================================		=========

Page No: 2 Invoice No: 6873-001

Personnel Summary

Date	Regular Hours	Overtime Hours	Sunday Holiday Hours	Total Personnel Cost
01/20/89 *** Total ***	0.00	8.00	0.00	370.64
and local and	0.00	8.00	0.00	370.64

HOTELSHIP STATES CENTRICATION

to the kind my knowledge and celleft to the covoice have neen performed and are accepted/

6/20/59 Septe Coordinator

for. \$370.64

Page No: 3 Invoice No: 6873-001

Billing History

ourrend impaire open	029.30
Current Amount Open	629.36
Current Ceiling Amount	1000.00
Total Billings to Date	370.64
Previous Billings This Billing	0.00 370.64

Page No. 4 05/15/89

Personnel Billing Delivery Order No. 7404-04-082 Invoice No. 6873-001

Date	Contractor Code	Employees Name	CLIN No.	Work Classification	Regular Hours	Regular Rate	Overtime Hours	Overtime Rate	Holiday	Sunday/ Holiday Rate	Total Personnel Cost	Cost From 1900.55	Audit Audit Diff. Code Type
** Contr 01/20/89 ** Subto	0999	O. H. MATERIALS STEELE, E.	018	Lab Technician	0.00	30.88	8.00	46.33	0.00	52.18	370.64	370.64	0.00 A
*** Tota	(***				0.00		8.00		0.00		370.64 370.64	370.64 370.64	0.00

Audit Code	Audi	t Туре
•••••		•
A Agrees with the 1900.55	D-1	Extension Error
D Disagrees with the 1900.55	D-2	Hours Calculation Error
	D-3	Wrong Rate Used
	D-4	Per Diems Billed as a O.D.C.
	0-5	Rounding Error
	D-6	Credit for Previous Invoice

Page No. 1 05/13/89

Field Purchases "Await Billing" List

Vendors			Estimated		Estimated Last	Last
Project Invoice			Await	Estimated	Total O.H.M.	O.H.M.
Number Date	Vendors Name	Work Description	Bill	G&A 12%	Await Bill Invoice #	Inv. Date
					•••••	

*** Total ***

0 0 0

Page No. 1 05/13/89

Subcontractors "Await Billing" List

Project Number		Vendors Name	Work Description	Estimated Await Bill	Estimated G&A 12%	Estimated Total Await Bill	O.H.M.	Last O.H.M. Inv. Date
*** Total	***							

0 0 0

INVENTORY PRICE LIST JUNE 1, 1988 TO DECEMBER 31,1988 •

CHARGE	DECCRIPTION	44 444	
CODE	DESCRIPTION	U/H	PRICE
60000	12 x 12 placards (all) 4 x 4 corrosive sticker	ea	\$0.28
			\$0.03
	4 X 4 EXPLOSIVE-A	EA	\$0.03
	4 X 4 EXPLOSIVE-B	EA	\$0.03
	4 X 4 EXPLOSIVE-C	ea -	\$0.03
	4 X 4 FLAMMABLE LIQUID	EA	\$0.03
	4 X 4 FLAMMABLE SOLID STICKER		\$0.03
60136 60000	4 X 4 PCB LABEL 4 X 4 POISON STICKER	EA	\$0.38
60000	6 X 6 HAZARDOUS WASTE	ea ea ea	\$0.03
60138	6 X 6 PCB LABEL STICKER	EA	\$0.19
60000	9 X 9 PCB LABEL STICKER	EA	\$0.40
60000	ABSORBENT ALL PURPOSE 50LB BG	EA DC	\$0.57
60000			\$4.61
60000		ea Ea	\$18.30
60000	ACID COVERALLS W/BOOTS/GLOVES	EA	\$21.14
60000	ACID HOODS H-501	EA EA	\$90.11
	ACID ROODS RESULT ACID KING HOOD-PACE SHIELD	ea Ea	\$133.66
60100	ACTIVATED CARBON, 55 LB. BAG		\$3.03
60202	ANTI-FOG MSA 13016	- •	\$52.75
60027	BOOTIES, VINYL	ea Pr	\$1.58
60022	BOOTS-CHEMICAL WADERS (ALL SIZES)	rr DB	\$1.58
60020	BOOTS-CHEST WADERS (ALL SIZES)	PR	\$46.38
60016	BOOTS-ROBARS (ALL SIZES)	PR	\$34.39
60018	BOOTS-TINGLEY/NEOPRENE \$1540	PR	\$12.35
60082	BROOM-36" BREAKER \$60-203	EA	\$21.69
60084	BROOM-UPRIGHT 62-2637	EA	\$20.47 \$5.38
60000		RL	\$3.38 \$13.50
60117	CLOTH DUCT TAPE 2" X 60 YARDS	P I	\$3.03
		EA	\$3.03 \$0.53
60019	DISPOSABLE POLY BOOT B-175	EA	\$0.30
60000	DISPOSABLE SCOOPS	EA	\$0.49
60028	DISPOSABLE SUITS SARAN COATED XLG	EA	\$10.44
60028	DISPOSABLE SUITS SARAN COATED XXLG	EΑ	\$11.48
60028	DISPOSABLE SUITS SARAN COATED XXXLG	EA	\$12.34
60029	DISPOSABLE TYVER SUITS X-LG	EA	\$2.78
60029	DISPOSABLE TYVEK SUITS XX-LG	EA	\$3.05
60029	DISPOSABLE TYVER SUITS XXX-LG	EA	\$3.14
	DRUMS	EA	QPO-FP
60094	DRUM GASKETS	EA	\$1.26
60096	DRUM LINERS	EA	\$7.57
60091	FLOOR SQUEEGES - 36"	EA	\$22.72
60032	FULL-FACE SHIELD, CLEAR	EA	\$3.85
60034	FULL-FACE SHIELD, TINTED W1042B	EA	\$4.73
60005	GLOVE-NITRILE	PR	\$1.10
60000	GLOVE-VITON	PR	\$29.66
60003	GLOVE-WIZARD LINER	EA	\$17.67
60004	GLOVES-ACID N-54	PR	\$7.36
60008	GLOVES-COTTON	PR	\$0.58
60006	GLOVES-PVC 13-152L	PR	\$2.86
60002	GLOVES-SAMPLE X-LG	EA	\$0.05

INVENTORY PRICE LIST JUNE 1, 1988 TO DECEMBER 31,1988 *

CULBCE			
CHARGE	DESCRIPTION	U/H	PRICE
- '		- -	TRICE
	GRAVEL 1/4" X 1/8"-100 LB. BAG		\$2.02
		ea	\$3.39
60134	HOSE-GARDEN 5/8" I.D. X 50FT	ea	\$15.78
60140	Label-Hazardous Waste	ea	\$0.16
60069	LABEL-HAZARDOUS WASTE LABELS-SAMPLE LIME HYDRATED SOLB BAG LUMBER CRAYON #496 MARKER-MEANSTREAK PENETONE - PCB CLEANER PH PAPER-WIDE RANGE 1-12	RL	\$6.31
60114	LIME HYDRATED SOLB BAG	BG	\$4.32
60090	LUMBER CRAYON #496	EA	\$0.44
60164	MARKER-MEANSTREAK	ea	\$1.63
60000	PENETONE - PCB CLEANER	GL	\$8.20
60071	PH PAPER-WIDE RANGE 1-12	RL	\$4.44
60000	PLACARD, CHLORINE	EΑ	\$0.03
	PLACARD, DANGEROUS WHEN WET 4X4	- · ·	\$0.05
	PLACARD, FLAMMABLE GAS 4X4	EA	\$0.05
	PLACARD, HAZARDOUS WASTE-PCB		\$0.27
	PLACARD, IRRITANT	EA	\$0.03
60000	PLACARD, ORGANIC PEROXIDE PLACARD, OXIDIZER	EA	\$0.03
60000	PLACARD, OXIDIZER	EA	\$0.03
60000			\$0.03
60000	PLACARD, RADIOACTIVE I 4X4	EA	\$0.03
60000	thons, which is a say	LA	\$0.03
60000	PLACARD, RADIOACTIVE III 4X4	EX	\$0.03
60116	POOL LINERS-12,000 GAL	EA	\$164.06
	POOL LINERS-50,000 GAL	EA	QPO-FP
60010	POOL LINERS-12,000 GAL POOL LINERS-50,000 GAL RAIN BIBS (ALL SIZES) RAIN JACKETS (ALL SIZES) RAKE-GARDEN R-15 RAKE-LEAF #SL-22 PECORDER BOOK 56-700	EA	\$2.55
60010	RAIN JACKETS (ALL SIZES)	Eλ	\$2.56
60080	RARE-GARDEN K-15	EA	\$16.92
60000	RARE-LEAF #SL-22 RECORDER BOOK 56-700 RESPIRATOR CARTRIDES R-59-A0 RESPIRATOR CARTRIDGES R-53-HE RESPIRATOR CARTRIDGES R-54-HE RESPIRATOR CARTRIDGES R-54-A	EA	\$7.64
60000	RECURDER BOOK DO-/VV	ŁA	\$9.97
60053	PECDIDATOR CARTAINES R-33-AU	PR	\$8.39
60000	DECDIDATION CARTRIDGES R-33-NE	PR	\$8.39
60050	RESPIRATOR CARTRIDGES R-57-A	PR	\$9.94
60050	RESPIRATOR CARTRIDGES R-91-A RESPIRATOR FILTERS R-30	PR PR	\$5.74
60000	PECDIDATOR CHAIRIDGES R-91-M	PR	\$8.39
60126	ROPE-POLYPROPYLENE 1/2" 600FT	- ·	\$5.05
60122	ROPE-POLYPROPYLENE 1/4" 600FT	RL RL	\$40.93
60124	ROPE-POLYPROPYLENE 3/8" 600FT	RL	\$12.05
60068	SAMPLE DIP TUBES	BX	\$26.77
60064	SAMPLE JARS-16 OZ	EÀ	\$44.17 \$1.02
60062	SAMPLE JARS-8 OZ	EA	\$0.85
60066	SAMPLE JARS-QUART	EA	\$1.44
60070	SAMPLE STRING 10006	RL	\$1.10
60106	SAND \$650 - 100 LB. BAG	BG	\$2.65
60087	SCRAPER-LONG HANDLED 6" #05C	EA	\$13.91
60088	SCRUB BRUSH, LONG HANDLED	EA	\$2.59
60089	SCRUB BRUSH, SHORT HANDLE	EA	\$1.45
60072	SHOVEL FLAT LONG HANDLE CZLS	EA	\$12.66
60076	SHOVEL FLAT SHORT HANDLE	EA	\$14.51
60074	SHOVEL POINTED LONG HANDLE	EA	\$11.62
60078	SHOVEL POINTED SHORT HANDLE	EA	\$18.34
60110	SODA ASH LITE 100LB BAG	BG	\$22.72
60144	SORBENT DIAPERS 156	BN	\$44.17
		= · • ·	4.4.41

INVENTORY PRICE LIST JUNE 1, 1988 TO DECEMBER 31,1988 *

CHARGE			
CODE	DESCRIPTION	U/M	PRICE
60148	SORBENT SAUSAGE 270	BN	\$114.84
60146	SORBENT SWEEPS 126	BN	\$55.84
60000	SWEEPING COMPOND SOLB BOX	BX	\$13.25
60132	TRASH BAGS, ROLLED	RL	\$1.89
60000	VERMICULITE	EA	\$8.58
60112	VISQUEEN 24' X 100' X 4 MIL	RL	\$27.76
60143	WIRE, TIE	RL	\$2.15

[•] REVISED APRIL 28, 1988



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

ACTION MEMORANDUM

Date: FEB 2 1 1989

Subject: Emergency Removal At the Currituck Phosphorus Debris Site

Currituck, North Carolina

From: Bill Klutz

On-Scene Coordinator

To: Files

PURPOSE

This memorandum is for authorization to proceed with an emergency removal action for \$2,145 at the Currituck Phosphorus Debris Site, Currituck, North Carolina. Due to its proximity to nearby residents and the presence white phosphorus this site poses a substantial threat to the public by direct contact with the material.

BACKGROUND

A. Incident or Site Description:

- 1. Physical Location: The material was located within the City limits of Currituck. The local Emergency Service personnel with the county had moved a phosphorus flare and a five gallon container to the emergency command post adjacent to the county Courthouse. The city of Currituck is located in the Northeast corner of North Carolina and lies on the Currituck Sound.
- 2. The site lies on the eastern coastal plain. Its topography is flat with only slight deviations. The articles were originally found on the beach at Currituck by the county emergency services director.
- There were no waste management activities being utilized at the site other than isolation being used by the local authorities.

B. Quantity and Types of Substances Present

The isolated articles consisted of:

- (a) one five gallon container marked corrosive and having the markings; NAVA NORF, indicating U.S. Navy, Norfolk, Virginia.
- (b) one metallic cylinder approximately sixteen inches long and three inches in diameter. The label on the cylinder indicated that the object contained phosphorus and to contact the nearest civilian or military authorities.

C. NPL Status

Not Applicable.

THREAT

A. Threat of Exposure of Public or the Environment

The material would represent a direct contact to any individual who may come in direct contact. A corrosive liquid will cause severe burns to the skin and eyes. The phosphorus cylinder if opened or ruptured would spontaneously ignite with contact with air. The temperature of the flame would approach 4000 degrees Fahrenheit.

PROPOSED PROJECT

A. Objectives of the Project

The objective of the project are to secure the hazardous substances and arrange for pickup by the nearest military authorities or use EPA's emergency contractor to provide explosive expertise to destroy the phosphorus by fire in an isolated location.

Project Cost

Extramural Cost Cleanup Contractor Cost TAT Cost Subtotal Contingency @15%	•	1,000 500 1,500 225
Total Extramural Cost	\$	1,725
Intramural Cost Direct Intramural Cost Indirect Intramural Cost	\$	150 270
Total Indirect Cost	\$	420
TOTAL SITE BUDGET	\$	2,145

C. Project schedule:

Begin: January 20, 1989 End: February 28, 1989

D. Consistency with Remedial Plan

Not Applicable

REGIONAL DETERMINATION

Because conditions at the Currituck Phosphorus Site meet the NCP Section 300.65 criteria for a response action, I as On-Scene Coordinator, Authorize expenditure not to exceed \$2,145 through the procurement authority delegated to me under Authority number 87-26-A008-B004

William Klutz

On-Scene Coordinator

Emergency Response and Control Section

Date

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4. TIME OF INITIAL ORDER (If initial order was verbal)	5. DELIVERY ORDER CEILING AMOUNT (Obligated Amount)						
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7a. ISSUED TO: CONTRACTOR (Name, Addres	s and ZIP Code)	Ba. ISSUED BY: ORDER	ING OFFICE (Name, Add	tress and ZIP Code)			
3.4. Materials 16406 0.5. Ot. 224 Les P.O. Box 531 Pi Glam, Obio 45939-3		William Ki U.S. ECA 345 Court Arlants, C	tond It. H.S.				
7b. PROGRAM MANAGER (Name and Phone I	Vumber)	8b. EPA REGION/USCO	DISTRICT	8c. ZONE			
Gos Classon - 404/s11-1	u Co	dea Requen	IV	4			
7c. RESPONSE MANAGER (Name and Phone I	Number)	8d. ON-SCENE COORD	NATOR (Name and Pho	ne Number)			
Ratify Represt	·	ļ	lahy vivilens				
9. RESPONSE LOCATION (Site Name and/or A	Address and 7IP Code	10. CONTRACTOR REQ					
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Ourrieush 160 27929		11. REQUIRED WORK COMPLETION DATE					
		February a	26, 1985				
12. STATEMENT OF WORK							
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: HAZARDOUS 	S SUBSTANCE RESPONSE F	UND CONT	RACTO	R COST	REPOR	RT PAGI	: 1	
							CONTRACT # :58-01-7404 :	
CONTRACTOR PERSONNEL REPORT DELIVERY ORDER # EPA STANDARD FORM 1900-55 7404-04-082								
1. EMPLOYEES ASSIGNED ERCS CONTRACTOR	WORK CLASSIFICATION COMPARED OF THE MATERIAL	HOURL	RATES!	TOT HOU	AL IRS	5. TRAVEL, LODGE, & PER DIEM	TOTAL PERSONNL COST	
STEELE, E.	018:LAB TECHNICIAN	30.88	16.33	0.00	8.00		370.64 ====== 370.64	
\$ 370.6 			\$	370.64 (LY ERC			DAY:	
SIGNATURE OF REPRESENTATIV	OSC DATE			OF CO	ONTRAC	TOR'S	2-20-89 DATE	

DAILY COST SUMMARY FOR 01/20/89 Page 1 ABANDONED DRUMS							
Site Total : ERCS: O.H. MATERIALS : TAT:	Ceilings 1,000 1,000 0			3alances 1,000 1,000			
Cost Categories	Today	Total	to Date	Balance : (% Remaining);			
1900-55 Costs: Personnel Equipment Unit Rate Materials At Cost Materials Subcontractors (Final Bills) Adjustments Total 1900-55 Cost ERCS Ceiling Balance % ERCS Funds Remaining	370.64 0.00 0.00 0.00 0.00 0.00	=====	370.64 0.00 0.00 0.00 0.00				
TAT Remaining Balance		 		0.00			
TAT Funds Remaining L EPA Costs:	; 	 		: 0 % : !!			
	!	! 		 			
Project Total Costs: Project Balance Remaining X Project Funds Remaining	370.64 	; ; ; ;	370.64	629.36 63 %			
	; ; ; ; ;						



February 21, 1989

Mr. William Klutz USEPA 345 Courtland Street, NE Atlanta, GA 30365

Dear Mr. Klutz:

RE: Delivery Order #7404-04-082

Currituck Phosphorus Debris Site

Currituck, North Carolina

Enclosed for your approval and signature is the 1900-55 form for the delivery order referred to above for the date of January 20, 1989.

After you or your representative sign the form, please send one signed copy back to me at the above-listed address as soon as possible.

If you should have any questions or require any additional information, please do not hesitate to contact me at 404-641-1066

Sincerely,

Blake A. Gilley

ERCS Contract Auditor

BAG: lhw

Enclosure

pc: File 6873-SJ2-85